



Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022
+1 212 909 6000

May 25, 2022

BY ELECTRONIC CASE FILING

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Hernan Lopez*, Case No. 15-cr-252 (PKC)

Dear Judge Chen,

We write on behalf of all parties to request a brief adjournment of the trial date in this matter, which was recently rescheduled to begin on January 3, 2023. The current schedule contemplates beginning the jury selection process immediately before the Christmas holiday, with jurors to return after the New Year to complete jury selection and begin trial. If it is feasible for the Court, the parties believe that beginning the jury selection process after the New Year, as in the proposed schedule below, will greatly reduce the significant potential for disruption in the jury selection process over the holiday period. We believe this brief adjournment will likely allow more potential jurors to serve and result in a more representative panel of potential jurors. It will also mitigate, to some extent, the disruption over the holidays to the parties, counsel and witnesses (and hopefully the Court).

Accordingly, the parties jointly request that the Court consider revising the current schedule as follows:

- January 5-6: Prospective jurors fill out questionnaires
- January 12: Parties file challenges for cause under seal
- January 13: Hearing on challenges for cause and complete voir dire
- January 17: Trial begins

Hon. Pamela K. Chen

2

May 25, 2022

We are grateful for the Court's consideration of this request, and we would be happy to discuss a potential alternative schedule at the Court's convenience.

Respectfully submitted,

/s/ David Sarratt
David Sarratt

919 Third Avenue
New York, New York 10022
Tel: (212) 909-6000

Counsel for Hernan Lopez

cc: All Counsel of Record (via ECF)
Clerk of Court (PKC) (via ECF)